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March 30, 2022

Re: *Set Capital LLC, et al. v. Credit Suisse Group AG, et al.*,  
No. 18-cv-02268-AT-SN

Dear Judge Netburn:

We represent Defendants Credit Suisse Group AG, Credit Suisse AG, Credit Suisse International, Tidjane Thiam, and David R. Mathers (the “Credit Suisse Defendants”) in the above-captioned action. We write pursuant to Part I.G of Your Honor’s Individual Practices in Civil Cases to respectfully request a modification of the deadlines set forth at Paragraphs 7 and 8(f)-11 of the July 20, 2021 Civil Case Management Plan and Scheduling Order (Dkt. No. 166) (the “Scheduling Order”).

The parties have worked diligently and cooperatively to resolve discovery issues, but only recently reached a final agreement regarding custodians, search terms and date ranges for document discovery. As a result, the current deadlines for the substantial completion of document production and the close of fact discovery are no longer feasible given the significant volume of materials to be reviewed and produced. We therefore respectfully request that Your Honor enter the Amended Proposed Civil Case Management Plan and Scheduling Order, enclosed herein as Exhibit A. For ease of reference, we also enclose as Exhibit B a redline comparison to the current schedule indicating which deadlines are affected by this request.

This is the Credit Suisse Defendants’ first request for an extension of the deadlines in the Scheduling Order. We have conferred with Class Plaintiffs’ counsel, who do not object to the request.

CAHILL GORDON & REINDEL LLP

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Respectfully submitted,

/s/ Sheila C. Ramesh

Sheila C. Ramesh

The Honorable Sarah Netburn  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

BY ECF

cc: The Honorable Analisa Torres  
All Counsel of Record